

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Ira R. Murray, III

Debtor

Case No.: 18-13504-AMC

Chapter No.: 13

**STIPULATION RESOLVING MOTION OF APEX MORTGAGE CORP. FOR RELIEF FROM THE
AUTOMATIC STAY AND OTHER RELIEF**

Whereas Apex Mortgage Corp. ('Apex Mortgage') has filed a motion for relief from the automatic stay and to prohibit the use of cash collateral (the 'Motion');

Whereas Apex Mortgage and Ira R. Murray, III (the 'Debtor' or 'Debtor') desire to resolve the Motion and agree and stipulate as follows:

1. As of October 30, 2018, Debtor is delinquent in post-petition payments in the total amount of \$2,717.91.
2. Debtor shall immediately tender \$853.07 to Apex Mortgage Corp. in good funds.
3. On or before November 2, 2018 Debtor shall pay \$853.07 to Apex Mortgage Corp. in good funds, which leaves a remaining balance of \$1,011.77 of arrears to be cured.
4. The Debtor shall cure the \$1,011.77 of arrears by making additional payments as set forth below:

Date Due	Amount Due
November 10, 2018	\$252.94
December 10, 2018	\$252.94
January 10, 2019	\$252.94
February 10, 2019	\$252.95

5. Beginning with the regular payment due on November 10, 2018, the Debtor shall remain current on post-petition mortgage payments.


6. If the Debtor fails to make any payment set forth in Paragraphs 2, 3, or 4 within five (5) days of when it is due, then Apex Mortgage may obtain an Order vacating the automatic stay by submitting a Certification of Default to the Bankruptcy Court, with a copy of the application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor's Counsel, and Debtor.
7. Commencing with the payment due November 10, 2018 the Debtor shall resume making regular post-petition mortgage payments to Apex Mortgage Corp. pursuant to the Promissory Note, Mortgage, and other Loan Documents.
8. If the Debtor fails to make any payment set forth in Paragraph 7 within thirty (30) days of when it is due, then Apex Mortgage Corp. may obtain an Order vacating the automatic stay by submitting a Certification of Default to the Bankruptcy Court, with a copy of the application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor's Counsel, and Debtor.
9. All payments shall be tendered directly to Apex Mortgage Corp. and mailed to the following address:

Apex Mortgage Corporation
ATTN: Pat Seymour
1 Walnut Grove Drive, Suite 300
Horsham, PA 19044
10. Apex will not request or require that attorney fees and costs related to the Motion be paid through the plan or as an administrative claim in this case, but retains its rights to recover these fees and costs pursuant to the loan documents.

I agree to the form and entry of the within Stipulation.

McDowell Law, PC
Attorneys for Apex Mortgage Corp.

BY:

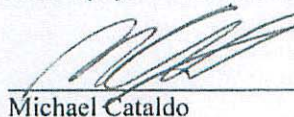

Daniel Reinganum

Date:

10-30-18

Cibik & Cataldo, P.C.
Attorneys for Ira R. Murray, III

BY:


Michael Cataldo

Date:

10/29/18



Dated: **November 1, 2018**

Judge Ashely M. Chan